

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**NINTH SUPPLEMENTAL DECLARATION OF LUC A. DESPINS REGARDING
RETENTION OF PAUL HASTINGS LLP AS COUNSEL TO OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

I, Luc A. Despins, hereby declare under penalty of perjury:

1. I am a partner in the law firm of Paul Hastings LLP ("Paul Hastings") with offices worldwide, including 200 Park Avenue, New York, New York 10166, and am admitted to practice in the State of New York. The facts set forth in this supplemental declaration (the "Ninth Supplemental Declaration") are based upon my personal knowledge, discussions with other Paul Hastings attorneys, and the firm's client/matter records that were reviewed by me or other Paul Hastings attorneys acting under my supervision and direction.

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On July 10, 2017, I submitted a declaration (the “Initial Declaration”) in support of the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing the Employment and Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors, Effective as of June 26, 2017* [Docket No. 610] (the “Retention Application”)² filed by the Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico in the above-captioned cases.

3. By order of this Court entered August 10, 2017 [Docket No. 999] (the “Retention Order”), Paul Hastings’ retention as counsel for the Committee was approved effective as of June 26, 2017. The Retention Order provided that “[t]he retention of Paul Hastings, as counsel to the Committee, shall be deemed to apply to the representation of the Committee if ever enlarged to include unsecured creditors of other debtors, without the need to obtain a modification of this Order.” On August 25, 2017, the U.S. Trustee expanded the role of that Committee to be the official committee for the HTA, ERS, and PREPA Debtors. Accordingly, Paul Hastings’ retention extends to the representation of the Committee as the official committee for the HTA, ERS, and PREPA Debtors.³

4. On September 22, 2017, I submitted the *First Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 1357] (the “First Supplemental Declaration”).

5. On February 13, 2018, I submitted the *Second Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 2485] (the “Second Supplemental Declaration”).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Retention Application.

³ The “Committee” refers to the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

6. On July 27, 2018, I submitted the *Third Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 3712] (the “Third Supplemental Declaration”).

7. On November 1, 2018, I submitted the *Fourth Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 4134] (the “Fourth Supplemental Declaration”).

8. On March 18, 2019, I submitted the *Fifth Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 5823] (the “Fifth Supplemental Declaration”).

9. On July 26, 2019, I submitted the *Sixth Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 8286] (the “Sixth Supplemental Declaration”).

10. On November 1, 2019, I submitted the *Seventh Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 9089] (the “Seventh Supplemental Declaration”).

11. On March 20, 2020, I submitted the *Eighth Supplemental Declaration of Luc A. Despins Regarding Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors* [Docket No. 12479] (the “Eighth Supplemental Declaration” and, together with the Initial Declaration, the First Supplemental Declaration, the Second Supplemental Declaration, the Third Supplemental Declaration, the Fourth Supplemental Declaration, the Fifth Supplemental Declaration, the Sixth Supplemental Declaration, and the Seventh Supplemental Declaration, the “Prior Declarations”). I hereby incorporate by reference, in their entirety, the Prior Declarations as if fully set forth herein.

Review and Disclosure of Additional Interested Parties

12. Since filing the Eighth Supplemental Declaration, Paul Hastings has become aware of additional Interested Parties (collectively, the “Additional Interested Parties”) in the Title III cases of the Commonwealth, COFINA, ERS, HTA, and PREPA (collectively, the “Title III Cases”). The identities of the Additional Interested Parties are set forth on Exhibit A hereto and include parties that have been added to the Master Service List (as of October 5, 2020) in the jointly administered Title III Cases (*i.e.*, the Commonwealth, COFINA, ERS, HTA, and PREPA) since the filing of the Eighth Supplemental Declaration.⁴

13. In preparing this Ninth Supplemental Declaration, Paul Hastings reviewed its conflicts check system for the names of the Additional Interested Parties. The results of our conflicts check were compiled and analyzed by Paul Hastings attorneys acting under my supervision. While certain individuals and entities may be Interested Parties in more than one capacity in the Title III Cases, *e.g.*, as a creditor in one or multiple Title III cases and as a party that has filed a notice of appearance, Paul Hastings’ updates do not cover changes in capacity during the course of a bankruptcy case. Given the prior disclosure of Paul Hastings’ relationship, if any, to such entities, such disclosure is not repeated here.

14. To the extent the conflicts check searches indicated that Paul Hastings has performed services for any Additional Interested Party within the last five years, the identity of such entity and the nature of Paul Hastings’ relationship with such entity are set forth in Exhibit B hereto. Exhibit B does not include relationships that Paul Hastings has with parents or affiliates of entities that were previously disclosed in the Prior Declarations.

⁴ To avoid duplication, entities that were included on Exhibit A to the Prior Declarations have not been included again on Exhibit A to this Ninth Supplemental Declaration.

15. To the best of my knowledge, based on the review procedures described above, Paul Hastings does not have any “connection” to the Additional Interested Parties, except as described in the Prior Declarations or in this Ninth Supplemental Declaration. Neither the term “connection,” as used in Bankruptcy Rule 2014, nor the proper scope of a professional’s search for “connection” has been defined; out of an abundance of caution, therefore, I am disclosing many representations that are not, to my understanding, disqualifying or problematic under PROMESA, the Bankruptcy Code, or applicable standards of professional ethics.

16. Neither I, nor any partner, of counsel, or associate of Paul Hastings, as far as I have been able to ascertain, has any connection with any Additional Interested Party, except as set forth below or otherwise in the Prior Declarations or this Ninth Supplemental Declaration (including the Exhibits hereto):

- (a) Attached hereto as **Exhibit B** and incorporated herein by reference is a list of Additional Interested Parties and other Interest Parties⁵ (or their affiliates) whom Paul Hastings represents, or has represented in the past, in matters **unrelated** to the matters on which the Committee has retained Paul Hastings. Although Paul Hastings has represented, currently represents, and may continue to represent certain entities and individuals listed on **Exhibit B** hereto, Paul Hastings will not represent any such entity or individual in the Title III Cases.
- (b) Each of the entities identified on **Exhibit B** hereto as a “current client” accounted for less than 0.7% of Paul Hastings’ fees collected for the firm’s fiscal year ending January 31, 2020. For the avoidance of doubt, the services performed for such entities were unrelated to the matters on which the Committee has retained Paul Hastings.

New Hires

17. Since filing the Eighth Supplemental Declaration, a number of individuals, including attorneys, legal interns, paralegals, and other paraprofessionals (collectively, the “**New Hires**”) have joined (or will shortly join) Paul Hastings. Except as detailed below per their input

⁵ Exhibit B also includes Interested Parties identified on Exhibit A to Prior Declarations with respect to which a new connection has arisen.

in the hiring process, these New Hires neither (i) worked on matters related to the Debtors or to Interested Parties in the Title III Cases nor (ii) were exposed to confidential information related to the Debtors or to Interested Parties in the Title III Cases in connection with their prior positions. Out of an abundance of caution, Paul Hastings has, nonetheless, determined to impose an ethical wall on certain of these New Hires, as detailed below.

i. New Hires *Not* Exposed to Confidential Information in Prior Position and, Out of an Abundance of Caution, Subject to Ethical Wall

18. In March 2020, Benjamin Stewart joined Paul Hastings as an associate in the Palo Alto office. From November 2017 to February 2020, Mr. Stewart was an associate at Morrison & Foerster LLP, which represents an ad hoc group of certain holders of Government Facilities Revenue Bonds and Government Facilities Revenue Refunding Bonds in the Title III Cases. Mr. Stewart has informed Paul Hastings that he did not work on matters related to the ad hoc group of bondholders or the Debtors and was not exposed to confidential information related to the ad hoc group of bondholders or the Debtors while he was at Morrison & Foerster. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Stewart and the firm's representation of the Committee in the Title III Cases.

19. In April 2020, Aaron Charfoos joined Paul Hastings as a partner in the Chicago office. Before joining Paul Hastings, Mr. Charfoos was a partner at Jones Day, which represents the ERS bondholders in the Title III Cases. Mr. Charfoos has informed Paul Hastings that he did not work on matters related to the ERS bondholders or the Debtors and was not exposed to confidential information related to the ERS bondholders or the Debtors while he was at Jones Day. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Charfoos and the firm's representation of the Committee in the Title III Cases.

20. In April 2020, Laura Coz joined Paul Hastings as a legal intern in the Paris office. From January 2018 to June 2018, Ms. Coz was an intern at Weil, Gotshal & Manges LLP (“Weil Gotshal”), which represents the National Public Finance Guarantee Corp. (“NPFGC”) in the Title III cases. Ms. Coz has informed Paul Hastings that she did not work on matters related to the NPFGC, the Debtors, or the Title III Cases and was not exposed to confidential information related to the NPFGC, the Debtors, or the Title III Cases while she was at Weil Gotshal. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Coz and the firm’s representation of the Committee in the Title III Cases.

21. In April 2020, Mark Cramer joined Paul Hastings as an associate in the Palo Alto office. Before joining Paul Hastings, Mr. Cramer was an associate at Richards, Layton & Finger, P.A. (“RLF”). Mr. Cramer has informed Paul Hastings that, while at RLF, he represented PJT Partners Inc.; Wilmington Trust, National Association; Wilmington Realty I, LLC; Wilmington Venture I (QP), LLC; Wilmington Real Estate Managers Fund Select LLC; and Mercedes-Benz Auto Lease Trust 2016-2 on matters unrelated to the Title III Cases. Mr. Cramer has further informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at RLF. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Cramer and the firm’s representation of the Committee in the Title III Cases.

22. In April 2020, Rakan F. Ghubej joined Paul Hastings as an associate in the New York office. From September 2015 to August 2018, Mr. Ghubej was an associate at Clyde & Co U.S. LLP (“Clyde”). Mr. Ghubej has informed Paul Hastings that, while at Clyde, he represented Chubb Bermuda, Chubb USA, and Sompo International in matters unrelated to the Title III Cases. Mr. Ghubej has further informed Paul Hastings that he did not work on matters

related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Clyde. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Ghubej and the firm's representation of the Committee in the Title III Cases.

23. In April 2020, Susannah Nagle joined Paul Hastings as an attorney in the New York office. Before joining Paul Hastings, Ms. Nagle was an associate at Orrick, Herrington & Sutcliffe LLP ("Orrick"), which represents Cantor-Katz Collateral Monitor LLC, as Collateral Monitor for GDB Debt Recovery Authority (the "Collateral Monitor"). Ms. Nagle has informed Paul Hastings that she did not work on matters related to the Collateral Monitor, the Debtors, or the Title III Cases and was not exposed to confidential information related to the Collateral Monitor, the Debtors, or the Title III Cases while she was at Orrick. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Nagle and the firm's representation of the Committee in the Title III Cases.

24. In April 2020, Will Peifer joined Paul Hastings as an associate in the New York office. Before joining Paul Hastings, Mr. Peifer was an associate at Orrick. Mr. Peifer has informed Paul Hastings that he did not work on matters related to the Collateral Monitor, the Debtors, or the Title III Cases and was not exposed to confidential information related to the Collateral Monitor, the Debtors, or the Title III Cases while he was at Orrick. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Peifer and the firm's representation of the Committee in the Title III Cases.

25. In April 2020, Mark Vible joined Paul Hastings as an associate in the Orange County, CA office. From October 2013 to January 2019, Mr. Vible was an associate at Milbank, Tweed, Hadley & McCloy LLP ("Milbank"), which represents Ambac Assurance Corporation ("Ambac") in the Title III Cases. Mr. Vible has informed Paul Hastings that he did not work on

matters related to Ambac or the Debtors and was not exposed to confidential information related to Ambac or the Debtors while he was at Milbank. Out of an abundance of caution, Paul Hastings imposed (and will continue to impose) an ethical wall between Mr. Vible and the firm's representation of the Committee in the Title III Cases.

26. In May 2020, Adam Farrell joined Paul Hastings as an associate in the London office. Before joining Paul Hastings, Mr. Farrell was an associate at White & Case LLP ("White & Case"), which represents certain junior COFINA bondholders, Doral Financial Corporation, the UBS Family of Funds, and the Puerto Rico Family of Funds in the Title III Cases. Mr. Farrell has informed Paul Hastings that he did not work on matters related to such entities or the Debtors and was not exposed to confidential information related to such entities or the Debtors while at White & Case. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Farrell and the firm's representation of the Committee in the Title III Cases.

27. In May 2020, Mei Lian joined Paul Hastings as a partner in the London office. Before joining Paul Hastings, Ms. Lian was a partner at Shearman & Sterling ("Shearman & Sterling"), which represents EcoEléctrica, L.P. in the Title III Cases. Ms. Lian has informed Paul Hastings that she did not work on matters related to EcoElectrica, L.P., the Debtors, or the Title III Cases and was not exposed to confidential information related to EcoElectrica, L.P., the Debtors, or the Title III Cases while she was at Shearman & Sterling. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Lian and the firm's representation of the Committee in the Title III Cases.

28. In May 2020, John J. Michels III joined Paul Hastings as an associate in the Chicago office. Before joining Paul Hastings, Mr. Michels was an associate at Jones Day. Mr. Michels has informed Paul Hastings that he did not work on matters related to the ERS

bondholders or the Debtors and was not exposed to confidential information related to the ERS bondholders or the Debtors while he was at Jones Day. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Michels and the firm's representation of the Committee in the Title III Cases.

29. In May 2020, Charlotte Monk joined Paul Hastings as an associate in the London office. From August 2014 to August 2016, and from September 2016 to December 2017, Ms. Monk was a trainee and associate, respectively, at Hogan Lovells International LLP ("Hogan Lovells"), which represents US Bank, NA and US Bank Trust, NA (each as trustee for various bond issues) (together, "US Bank") in the Title III Cases. Ms. Monk has informed Paul Hastings that she did not work on matters related to US Bank or the Debtors and was not exposed to confidential information related to US Bank or the Debtors while she was at Hogan Lovells. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Monk and the firm's representation of the Committee in the Title III Cases.

30. In May 2020, Jeremy Lucas Tong joined Paul Hastings as an associate in the Paris office. From March 2018 to April 2020, Mr. Tong was an associate at White & Case. Mr. Tong has informed Paul Hastings that, while at White & Case, he worked on certain matters unrelated to the Title III Cases for Bank of Nova Scotia and Natixis. From September 2017 to January 2018, Mr. Tong worked at Rothschild & Co. in Paris and Brussels. From September 2016 to January 2017, Mr. Tong worked at Norton Rose Fulbright LLP ("Norton Rose"), which represents PREPA and the Puerto Rico Public Building Authority (the "PBA") in the Title III Cases. From September 2015 to December 2015, Mr. Tong worked at Willkie Farr & Gallagher LLP ("Willkie Farr"), which represents the COFINA Agent in the Title III Cases. Mr. Tong has informed Paul Hastings that he did not work on matters related to the junior COFINA bondholders, Doral Financial Corporation, the UBS Family of Funds, the Puerto Rico Family of

Funds, PREPA, the PBA, the COFINA Agent, or the Debtors and was not exposed to confidential information related to such entities or the Debtors while he was at White & Case, Rothschild, Norton Rose, and Willkie Farr. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Tong and the firm's representation of the Committee in the Title III Cases.

31. In June 2020, Samira Amezzane joined Paul Hastings as an attorney in the London office. From September 2016 to May 2020, Ms. Amezzane was an associate with Dechert LLP ("Dechert"), which is counsel to Peaje Investments, LLC ("Peaje") in the Title III Cases. Ms. Amezzane has informed Paul Hastings that she did not work on matters related to Peaje or the Debtors and was not exposed to confidential information related to Peaje or the Debtors while at Dechert. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Amezzane and the firm's representation of the Committee in the Title III Cases.

32. In June 2020, Charlotte Fraysse joined Paul Hastings as a legal intern in the Paris office. From July 2019 to December 2019, Ms. Fraysse was a law clerk with Willkie Farr in Paris. Ms. Fraysse has informed Paul Hastings that she did not work on matters related to the COFINA Agent or the Debtors and was not exposed to confidential information related to the COFINA Agent or the Debtors while at Willkie Farr. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Fraysse and the firm's representation of the Committee in the Title III Cases.

33. In June 2020, Duc Heiu Le joined Paul Hastings as a legal intern in the Frankfurt office. From November 2016 to March 2017, Mr. Le was a legal research assistant with Dechert. From January 2015 to March 2015, Mr. Le was a student intern with KPMG Law in Hamburg. Mr. Le has informed Paul Hastings that he did not work on matters related to Peaje or the

Debtors and was not exposed to confidential information related to Peaje or the Debtors while at Dechert and KPMG Law. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Le and the firm's representation of the Committee in the Title III Cases.

34. In June 2020, Christine Matott joined Paul Hastings as an Of Counsel in the Chicago office. From March 2017 to June 2020, Ms. Matott worked at Kirkland & Ellis LLP ("K&E"), which is listed as a creditor holding one of the twenty largest unsecured claims in the Commonwealth of Puerto Rico Title III Case. From July 2016 to March 2017, Ms. Matott worked at Winston & Strawn LLP ("Winston") in Chicago. Ms. Matott has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at K&E and Winston. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Matott and the firm's representation of the Committee in the Title III Cases.

35. In June 2020, James "Bo" Pearl joined Paul Hastings as a partner in the Century City office. From 1995 to May 2020, Mr. Pearl was an attorney with O'Melveny & Myers LLP ("O'Melveny"), which represents AAFAF in the Title III Cases. Mr. Pearl has informed Paul Hastings that he did not work on matters related to AAFAF or the Debtors and was not exposed to confidential information related to AAFAF or the Debtors while at O'Melveny. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Pearl and the firm's representation of the Committee in the Title III Cases.

36. In June 2020, Cristina Radu joined Paul Hastings as a professional support lawyer in the Paris office. From September 2016 to February 2019, Ms. Radu was an associate at Orrick. From November 2009 to September 2012, Ms. Radu was an associate at Weil Gotshal.

Ms. Radu has informed Paul Hastings that she did not work on matters related to the Collateral Monitor, NPFGC, the Debtors, or the Title III Cases and was not exposed to confidential information related to the Collateral Monitor, NPFGC, the Debtors, or the Title III Cases while she was at Orrick and Weil Gotshal. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Radu and the firm's representation of the Committee in the Title III Cases.

37. In July 2020, Christopher Hill joined Paul Hastings as an associate in the New York office. Before joining Paul Hastings, Mr. Hill was an associate at Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), which represents the COFINA Senior Bondholders' Coalition in the Title III Cases. Mr. Hill has informed Paul Hastings that he did not work on matters related to the COFINA Senior Bondholders' Coalition or the Debtors and was not exposed to confidential information related to the COFINA Senior Bondholders' Coalition or the Debtors while at Quinn Emanuel. Out of an abundance of caution, Paul Hastings imposed (and will continue to impose) an ethical wall between Mr. Hill and the firm's representation of the Committee in the Title III Cases.

38. In July 2020, Jessica Tian joined Paul Hastings as an associate in the Shanghai office. Before joining Paul Hastings, Ms. Tian was an associate in the Shanghai office of Reed Smith LLP ("Reed Smith"), which represents the Bank of New York Mellon ("BNY") and Siemens Transportation Partnership Puerto Rico, S.E. and Siemens Corporation (together "Siemens") in the Title III Cases. Ms. Tian has informed Paul Hastings that she did not work on matters related to BNY, Siemens, or the Debtors and was not exposed to confidential information related to such entities or the Debtors while she was at Reed Smith. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Tian and the firm's representation of the Committee in the Title III Cases.

39. In July 2020, Yi Wan joined Paul Hastings as an associate in the Shanghai office. From September 2019 to July 2020, and from April 2015 to July 2018, Mr. Wan worked in various capacities, including associate, legal consultant, and paralegal, for Squire Patton Boggs. Mr. Wan has informed Paul Hastings that, while at Squire Patton Boggs, he represented Baccardi Martini Asia Pacific Limited in matters unrelated to the Title III Cases. Mr. Wan has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Squire Patton Boggs. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Wan and the firm's representation of the Committee in the Title III Cases.

40. In the summer of 2020, Andrea Rodriguez Boutros joined Paul Hastings as a summer associate in the Los Angeles office. In the summer of 2018, Ms. Boutros was an SEO Law Fellow at O'Melveny. From October 2017 to May 2018, Ms. Boutros worked as a consultant and then as a legal intern at Akin Gump Strauss Hauer & Feld LLP ("Akin Gump"), which represents a bondholder in the Title III Cases (the "Akin Bondholder"). Ms. Boutros has informed Paul Hastings that she did not work on matters related to AAFAF, the Akin Bondholder, or the Debtors and was not exposed to confidential information related to AAFAF, the Akin Bondholder, or the Debtors while she was at O'Melveny and Akin Gump. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Boutros and the firm's representation of the Committee in the Title III Cases.

41. In the summer of 2020, Nina Golshan joined Paul Hastings as a summer associate in the Los Angeles office. From July 2016 to June 2018, Ms. Golshan was a paralegal with Akin Gump. Ms. Golshan has informed Paul Hastings that she did not work on matters related to the Akin Bondholder, the Debtors, or the Title III Cases and was not exposed to confidential

information related to the Akin Bondholder, the Debtors, or the Title III Cases while she was at Akin Gump. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Golshan and the firm's representation of the Committee in the Title III Cases.

42. In the summer of 2020, Nia Joyner joined Paul Hastings as a summer associate in the Los Angeles office. From May 2018 to July 2018, Ms. Joyner was an SEO Law Fellow at Shearman & Sterling. From June 2017 to August 2017, Ms. Joyner was a compliance analyst at Morgan Stanley. Ms. Joyner has informed Paul Hastings that she did not work on matters related to EcoElectrica, L.P., the Debtors, or the Title III Cases and was not exposed to confidential information related to EcoElectrica, L.P., the Debtors, or the Title III Cases while she was at Shearman & Sterling and Morgan Stanley. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Joyner and the firm's representation of the Committee in the Title III Cases.

43. As discussed in the Sixth Supplemental Declaration, Zhengxin Liu worked as a 2019 summer intern in Paul Hastings' Shanghai office. Before that time, Ms. Liu worked as a tax intern at KPMG Advisory (China) Limited, Shanghai Office ("KPMG"). Ms. Liu has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at KPMG. During the summer of 2019, Paul Hastings established an ethical wall to screen Ms. Liu from matters related to the Title III Cases. In the summer of 2020, Ms. Liu joined Paul Hastings as a summer intern in the Shanghai office, and Paul Hastings has similarly imposed an ethical wall between her and the firm's representation of the Committee in the Title III Cases.

44. In the summer of 2020, Melissa Rake joined Paul Hastings as a summer associate in the Palo Alto office. Ms. Rake has informed Paul Hastings that her mother is a Senior Auditor at the Defense Contract Audit Agency, which audits U.S. Department of Defense contracts. Ms. Rake has informed Paul Hastings that she has not been exposed to confidential information related to the Debtors or the Title III Cases. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Rake and the firm's representation of the Committee in the Title III Cases.

45. In the summer of 2020, Schlea Thomas joined Paul Hastings as a summer associate in the Houston office. From May 2017 to June 2017, Ms. Thomas was a summer intern at Norton Rose. Ms. Thomas has informed Paul Hastings that she did not work on matters related to PREPA, the PBA, or the Debtors and was not exposed to confidential information related to such entities or the Debtors while at Norton Rose. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Thomas and the firm's representation of the Committee in the Title III Cases.

46. From August 2020 to December 2020, Roxane Brodin will work with Paul Hastings as a legal intern in the Paris office. From April 2020 to July 2020, Ms. Brodin was a law clerk with Dechert. Mr. Brodin has informed Paul Hastings that she did not work on matters related to Peaje or the Debtors and was not exposed to confidential information related to Peaje or the Debtors while at Dechert. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Brodin and the firm's representation of the Committee in the Title III Cases.

47. In August 2020, Helen Cheung joined Paul Hastings as a trainee solicitor in the Hong Kong office. Before joining Paul Hastings, Ms. Cheung was an intern in the Hong Kong office of Reed Smith. From May 2017 to August 2017, Ms. Cheung was a project officer for

BlackRock. Ms. Cheung has informed Paul Hastings that she did not work on matters related to BNY, Siemens, or the Debtors and was not exposed to confidential information related to BNY, Siemens, or the Debtors while she was at Reed Smith and BlackRock. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Cheung and the firm's representation of the Committee in the Title III Cases.

48. In August 2020, Crispin Daly joined Paul Hastings as an associate in the London office. From May 2012 to August 2020, Mr. Daly was an associate in the London office of Proskauer Rose LLP ("Proskauer"), which represents the Oversight Board in the Title III Cases. Mr. Daly has informed Paul Hastings that, while at Proskauer, he represented Varde Partners and Trafigura Pte Ltd Singapore in matters unrelated to the Title III Cases. From August 2008 to October 2011, Mr. Daly was a trainee and then an associate at Orrick. Mr. Daly has informed Paul Hastings that he did not work on matters related to the Oversight Board, the Collateral Monitor, or the Debtors and was not exposed to confidential information related to the Oversight Board, the Collateral Monitor, or the Debtors while he was at Proskauer and Orrick. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Daly and the firm's representation of the Committee in the Title III Cases.

49. In August 2020, Peter Hayes joined Paul Hastings as a partner in the London office. Before joining Paul Hastings, Mr. Hayes was a partner at Shearman & Sterling. Mr. Hayes has informed Paul Hastings that he did not work on matters related to EcoElectrica, L.P., the Debtors, or the Title III Cases and was not exposed to confidential information related to EcoElectrica, L.P., the Debtors, or the Title III Cases while he was at Shearman & Sterling. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Hayes and the firm's representation of the Committee in the Title III Cases.

50. In August 2020, Avery Johnson joined Paul Hastings as an associate in the Century City office. From May 2016 to July 2016, and from September 2017 to September 2019, Ms. Johnson was a summer associate and associate, respectively, at Simpson Thacher & Bartlett LLP (“Simpson Thacher”), which represents Sola Ltd., Solus Opportunities Fund 5 LP, and Ultra Master Ltd. in the Title III Cases. Ms. Johnson has informed Paul Hastings that she did not work on matters related to these entities or the Debtors and was not exposed to confidential information related to these entities or the Debtors while she was at Simpson Thacher. Ms. Johnson has further informed Paul Hastings that, while at Simpson Thacher, she worked on certain matters unrelated to the Title III Cases for Lazard Freres Co., IPC Systems, Inc., and Virtus Investment Partners. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Johnson and the firm’s representation of the Committee in the Title III Cases.

51. In August 2020, Lori Millang joined Paul Hastings as a legal project manager in the Palo Alto office. From February 2019 to August 2020, Ms. Millang was a legal project manager at Hogan Lovells. From October 2015 to February 2019, Ms. Millang was a practice group analyst and a legal practice specialist at DLA Piper LLP (“DLA Piper”), which represents the ERS, the University of Puerto Rico (the “UPR”), and the Puerto Rico Fiscal Agency and Financial Advisory Authority (the “AAFAF”) in the Title III Cases. Ms. Millang has informed Paul Hastings that she did not work on matters related to US Bank, the ERS, the UPR, the AAFAF, or the Debtors and was not exposed to confidential information related to such entities or the Debtors while she was at Hogan Lovells and DLA Piper. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Millang and the firm’s representation of the Committee in the Title III Cases.

52. In August 2020, Beatrice Wun joined Paul Hastings as a trainee solicitor in the Hong Kong office. In June 2017, Ms. Wun was a summer intern in the Warsaw office of Greenberg Traurig, LLP (“Greenberg”), which represents PREPA in the Title III cases. Ms. Wun has informed Paul Hastings that she did not work on matters related to PREPA, the Debtors, or the Title III Cases and was not exposed to confidential information related to PREPA, the Debtors, or the Title III Cases while she was at Greenberg. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Wun and the firm’s representation of the Committee in the Title III Cases.

53. In August 2020, Yongkang Xu joined Paul Hastings as a summer intern in the Shanghai office. From December 2017 to February 2018, Mr. Xu was an intern at Squire Patton Boggs in Shanghai. Mr. Xu has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Squire Patton Boggs. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Xu and the firm’s representation of the Committee in the Title III Cases.

54. In September 2020, Arthur de Baudry d’Asson joined Paul Hastings as a partner in the Paris office. Before joining Paul Hastings, Mr. Baudry d’Asson was a partner at Weil Gotshal. Mr. Baudry d’Asson has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Weil Gotshal. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Baudry d’Asson and the firm’s representation of the Committee in the Title III Cases.

55. In September 2020, Michelle Gordon joined Paul Hastings as an associate in the London office. From March 2016 to August 2020, Ms. Gordon was an associate with Dechert.

From July 2014 to February 2016, Ms. Gordon worked at DLA Piper. Ms. Gordon has informed Paul Hastings that she did not work on matters related to Peaje, the ERS, the UPR, the AAFAF, or the Debtors and was not exposed to confidential information related to such entities or the Debtors while she was at Dechert and DLA Piper. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Gordon and the firm's representation of the Committee in the Title III Cases.

56. In September 2020, Rupert Gorst joined Paul Hastings as a trainee solicitor in the London office. From March 2019 to July 2019, Mr. Gorst was a paralegal at Simpson Thacher. Mr. Gorst has informed Paul Hastings that he did not work on matters related to Sola Ltd., Solus Opportunities Fund 5 LP, Ultra Master Ltd., or the Debtors and was not exposed to confidential information related to these entities or the Debtors while he was at Simpson Thacher. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Gorst and the firm's representation of the Committee in the Title III Cases.

57. In September 2020, Gavin Mooney joined Paul Hastings as an associate in the London office. From April 2018 to September 2018, Mr. Mooney was an associate at White & Case. From May 2016 to May 2018, Mr. Mooney was an associate at Simpson Thacher. Mr. Mooney has informed Paul Hastings that he did not work on matters related to the junior COFINA bondholders, Doral Financial Corporation, the UBS Family of Funds, the Puerto Rico Family of Funds, Sola Ltd., Solus Opportunities Fund 5 LP, Ultra Master Ltd., or the Debtors and was not exposed to confidential information related to these entities or the Debtors while he was at White & Case and Simpson Thacher. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Mooney and the firm's representation of the Committee in the Title III Cases.

58. In September 2020, David Shennan joined Paul Hastings as an associate in the London office. From May 2011 to August 2020, Mr. Shennan was an associate in the London office of Shearman & Sterling. Mr. Shennan has informed Paul Hastings that he did not work on matters related to EcoElectrica, L.P., the Debtors, or the Title III Cases and was not exposed to confidential information related to EcoElectrica, L.P., the Debtors, or the Title III Cases while he was at Shearman & Sterling. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Shennan and the firm's representation of the Committee in the Title III Cases.

59. In September 2020, Laura Skinner joined Paul Hastings as director of the Life Sciences Consulting Group in the New York office. Before joining Paul Hastings, Ms. Skinner was a senior manager in the Life Sciences Advisory Practice with Deloitte & Touche LLP. Ms. Skinner has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Deloitte & Touche. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Skinner and the firm's representation of the Committee in the Title III Cases.

60. In September 2020, Yayi Wang joined Paul Hastings as a summer intern in the Beijing office. From January 2020 to September 2020, Ms. Wang was an intern at Hogan Lovells in Beijing. Ms. Wang has informed Paul Hastings that she did not work on matters related to US Bank or the Debtors and was not exposed to confidential information related to US Bank or the Debtors while she was at Hogan Lovells. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Wang and the firm's representation of the Committee in the Title III Cases.

61. In October 2020, Mengying Li joined Paul Hastings as an associate in the Beijing (and then Hong Kong) office. From July 2015 to September 2020, Ms. Li was an associate at K&E. From February 2014 to June 2015, Ms. Li was a legal assistant at Simpson Thacher. Ms. Li has informed Paul Hastings that she did not work on matters related to Sola Ltd., Solus Opportunities Fund 5 LP, Ultra Master Ltd., or the Debtors and was not exposed to confidential information related to these entities or the Debtors while she was at K&E and Simpson Thacher. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Ms. Li and the firm's representation of the Committee in the Title III Cases.

62. In October 2020, Laurence McGinley joined Paul Hastings as a paralegal in the London office. From February 2020 to August 2020, Mr. McGinley was a legal intern with Dechert in London. Mr. McGinley has informed Paul Hastings that he did not work on matters related to Peaje or the Debtors and was not exposed to confidential information related to Peaje or the Debtors while at Dechert. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. McGinley and the firm's representation of the Committee in the Title III Cases.

63. In October 2020, David Walsh joined Paul Hastings as counsel in the Los Angeles office. From March 2013 to September 2020, Mr. Walsh was a partner at Morrison & Foerster. Mr. Walsh has informed Paul Hastings that he did not work on matters related to the ad hoc group of bondholders or the Debtors and was not exposed to confidential information related to the ad hoc group of bondholders or the Debtors while he was at Morrison & Foerster. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Walsh and the firm's representation of the Committee in the Title III Cases.

ii. New Hires **Not** Exposed to Confidential Information in Prior Position and **Not** Subject to Ethical Wall⁶

64. For certain of the New Hires, Paul Hastings has determined that it is not necessary to set up an ethical wall due to variety of factors (in addition to the fact that these New Hires did not work on matters related to the Debtors and were not exposed to confidential information related to the Debtors). Among these factors are that these New Hires are not expected to work on the Puerto Rico matter, they generally had a low level of seniority at their prior employment, and/or their prior employment long predates these Title III cases.

65. As discussed in the Fifth Supplemental Declaration, in December 2018, Gavin Murphy joined Paul Hastings as an associate in the San Francisco office. From September 2017 to November 2018, and from May 2016 to July 2016, Mr. Murphy worked in the San Francisco office of K&E. Mr. Murphy has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at K&E. While Paul Hastings initially imposed an ethical wall between Mr. Murphy and the firm's representation of the Committee in the Title III Cases out of an abundance of caution, Paul Hastings removed the wall in April 2020 given that Mr. Murphy did not work on matters related to the Debtors or the Title III Cases while at K&E and was not exposed to confidential information related to the Debtors or the Title III Cases while at K&E.

66. In March 2020, Ryan Nash joined Paul Hastings as an associate in the London office. From July 2019 to March 2020, Mr. Nash worked at Mourant Ozannes in London. Mr. Nash has informed Paul Hastings that, while there, he worked on certain matters unrelated to the

⁶ In addition to not having been exposed to confidential information in their prior positions, the New Hires listed below have not worked on the Title III Cases or related matters while at Paul Hastings and are not expected to do so.

Title III Cases for Lloyds Bank plc and Greenergy Group Holdings Limited. From February 2018 to July 2019, Mr. Nash worked at Allens Linklaters in Australia. Mr. Nash has informed Paul Hastings that, while there, he worked on certain matters unrelated to the Title III Cases for Brookfield Australia Funds Management Limited. In August 2016, Mr. Nash was a corporate counsel intern at Billabong International Limited (“Billabong”) in Australia. Mr. Nash has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Mourant Ozannes, Allens Linklaters, and Billabong.

67. In April 2020, Tyler Dodge joined Paul Hastings as an associate in the San Diego office. From June 2010 to August 2010, and from June 2011 to June 2014, Mr. Dodge was a summer analyst and analyst, respectively, at Goldman Sachs. Mr. Dodge has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Goldman Sachs.

68. In April 2020, Tiffany Jones joined Paul Hastings as an associate in the San Francisco office. From September 2013 to November 2013, Ms. Jones was a law clerk with the U.S. Department of Justice (the “DOJ”). In the summer of 2012, Ms. Jones as a legal assistant with Davis Polk & Wardwell LLP (“Davis Polk”), which represents a group of Puerto Rico bondholders in the Title III Cases. Ms. Jones has informed Paul Hastings that she did not work on matters related to the Puerto Rico bondholders, the Debtors, or the Title III Cases and was not exposed to confidential information related to the Puerto Rico bondholders, the Debtors, or the Title III Cases while she was at the DOJ and Davis Polk.

69. In July 2020, Christina Olliver joined Paul Hastings as an associate in the London office. Before joining Paul Hastings, Ms. Olliver worked at Stephenson Harwood LLP (“SH”) in

London. Ms. Olliver has informed Paul Hastings that, while at SH, she worked on certain matters unrelated to the Title III Cases for Banco Santander, S.A. Ms. Olliver has further informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at SH.

70. As discussed in the Sixth Supplemental Declaration, Azzam Chaudhry worked as a 2019 summer associate in Paul Hastings' Orange County office. From January 2018 to July 2018, Mr. Chaudhry was a financial auditor at the DOJ. Mr. Chaudhry has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at the DOJ. In the summer of 2020, Azzam Chaudhry joined Paul Hastings as a summer associate in the Orange County office.

71. In the summer of 2020, Anuva Ganapathi joined Paul Hastings as a summer associate in the Palo Alto office. From August 2019 to December 2019, Ms. Ganapathi was a legal intern at the DOJ. Ms. Ganapathi has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at the DOJ.

72. In the summer of 2020, Nicole Heller joined Paul Hastings as a summer associate in the San Francisco office. From October 2019 to March 2020, Ms. Heller participated in the K&E Corporate Lab Clinic at The University of Chicago Law School. Ms. Heller has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while participating in the clinic.

73. In the summer of 2020, Richala Jackson joined Paul Hastings as a summer associate in the Houston office. From May 2018 to May 2019, Ms. Jackson was an office concierge at Butler Snow LLP. Ms. Jackson has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Butler Snow.

74. In the summer of 2020, Andrew Taesup Park joined Paul Hastings as a summer associate in the Los Angeles office. From January 2020 to April 2020, Mr. Park was a legal intern with the U.S. Securities & Exchange Commission (the “SEC”). Mr. Park has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at the SEC.

75. In the summer of 2020, Salvatore Trinchetto joined Paul Hastings as a summer associate in the Chicago office. From October 2019 to March 2020, Mr. Trinchetto participated in the K&E Corporate Lab Clinic at The University of Chicago Law School. Mr. Trinchetto has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while participating in the clinic.

76. In August 2020, Mena Gaballah joined Paul Hastings as an associate in the New York office. Before joining Paul Hastings, Mr. Gaballah worked at Crowell & Moring LLP (“Crowell”) in Washington, D.C. Mr. Gaballah has informed Paul Hastings that, while at Crowell, he worked on certain matters unrelated to the Title III Cases for BMW. Mr. Gaballah has further informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Crowell.

77. In August 2020, Helen He joined Paul Hastings as a summer intern in the Shanghai office. From April 2020 to July 2020, Ms. He was a legal assistant with Yuanda China Law Offices, which has a strategic alliance with Winston. Ms. He has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Yuanda China Law Offices.

78. In August 2020, Peter Lindsay joined Paul Hastings as a partner in the Washington, D.C. office. Before joining Paul Hastings, Mr. Lindsay was a partner with Sidley & Austin LLP ("Sidley"), which is a defendant in one of the adversary proceedings related to the Title III cases. Mr. Lindsay has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while at Sidley.

79. In August 2020, Yu Liu joined Paul Hastings as a summer intern in the Shanghai office. From July 2018 to January 2019, Ms. Liu was an intern with McDermott Will & Emery ("McDermott"), which represents Goldman Sachs Asset Management, LP ("Goldman Sachs") in the Title III Cases. Ms. Liu has informed Paul Hastings that she did not work on matters related to Goldman Sachs, the Debtors, or the Title III Cases and was not exposed to confidential information related to Goldman Sachs, the Debtors, or the Title III Cases while she was at McDermott.

80. In August 2020, Brady Mickelsen joined Paul Hastings as an associate in the Washington, D.C. office. Before joining Paul Hastings, Mr. Mickelsen was an associate with Sidley. Mr. Mickelsen has informed Paul Hastings that, while at Sidley, he worked on a matter unrelated to the Title III Cases for Cardinal Health and Roper Industries. Mr. Mickelsen has further informed Paul Hastings that he did not work on matters related to the Debtors or the Title

III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while at Sidley.

81. In August 2020, Alison Morris joined Paul Hastings as an associate in the London office. From September 2015 to August 2017, and from September 2017 to August 2020, Ms. Morris worked as a trainee solicitor and then an associate, respectively, at Herbert Smith Freehills LLP (“Herbert Smith”) in London. Ms. Morris has informed Paul Hastings that, while at Herbert Smith, she worked on certain matters unrelated to the Title III Cases for Lloyds Banking Group plc. Ms. Morris has further informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Herbert Smith.

82. In August 2020, Jesselyn Pe joined Paul Hastings as an associate in the New York office. Before joining Paul Hastings, Ms. Pe was an associate with Sidley. Ms. Pe has informed Paul Hastings that, while at Sidley, she worked on a matter unrelated to the Title III Cases for Stericycle. Ms. Pe has further informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while at Sidley.

83. In August 2020, Nathan Sheers joined Paul Hastings as a partner in the Washington, D.C. office. Before joining Paul Hastings, Mr. Sheers was a partner with Sidley. Mr. Sheers has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while at Sidley.

84. In August 2020, Enya Tian joined Paul Hastings as a summer intern in the Shanghai office. From June 2019 to August 2019, Ms. Tian was an intern with BMW in Shanghai. Ms. Tian has informed Paul Hastings that she did not work on matters related to the

Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at BMW.

85. In August 2020, Claire You joined Paul Hastings as a China advisor in the Shanghai office. From August 2019 to August 2020, Ms. You worked as a legal associate at Han Kun Law Offices in Shanghai. Ms. You has informed Paul Hastings that, while at Han Kun Law Offices, she worked on a transaction unrelated to the Title III Cases for Brookfield Asset Management Inc. Ms. You has further informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Han Kun Law Offices.

86. In August 2020, Zoey Xie joined Paul Hastings as a China associate in the Shanghai office. From June 2018 to August 2020, Ms. Xie was an associate with Arnold Porter Kaye Scholer LLP ("Arnold Porter") in Shanghai. Ms. Xie has informed Paul Hastings that, while at Arnold Porter, she worked on a matter unrelated to the Title III Cases for Bristol Myers Squibb. From December 2014 to June 2018, Ms. Xie was an associate with McDermott in Shanghai. Ms. Xie has further informed Paul Hastings that she did not work on matters related to Goldman Sachs, the Debtors, or the Title III Cases and was not exposed to confidential information related to Goldman Sachs, the Debtors, or the Title III Cases while she was at Arnold Porter and McDermott.

87. In September 2020, Katia Aouidef joined Paul Hastings as a legal intern in the Paris office. From September 2019 to July 2020, Ms. Aouidef served as legal counsel at AXA IM Paris SA ("AXA"). Ms. Aouidef has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at AXA.

88. In September 2020, Tania Gout joined Paul Hastings as a legal intern in the Paris office. From August 2018 to February 2019, and in June 2015, Ms. Gout was an intern at Total Global Procurement and Total E&P, respectively. Ms. Gout has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at Total Global Procurement and Total E&P.

89. In September 2020, Derwin Jenkinson joined Paul Hastings as a partner in the London office. Before joining Paul Hastings, Mr. Jenkinson was a partner at Ashurst LLP in London. Mr. Jenkinson has informed Paul Hastings that, while at Ashurst, he worked on certain matters unrelated to the Title III Cases for Davidson Kempner. Mr. Jenkinson has further informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Ashurst.

90. In September 2020, Issac Khan joined Paul Hastings as a senior project manager in the Los Angeles office. Before joining Paul Hastings, Mr. Khan worked with Control Risks on a few projects unrelated to the Title III Cases for Morrison & Foerster. Mr. Khan has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Control Risks.

91. In September 2020, Siyao Li joined Paul Hastings as a summer intern in the Shanghai office. From June 2018 to August 2018, Ms. Li was a summer intern at PricewaterhouseCoopers (“PwC”). Ms. Li has informed Paul Hastings that she did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while she was at PwC.

92. In September 2020, Silas Raggett joined Paul Hastings as a trainee solicitor in the London office. In July 2019, Mr. Raggett was an intern with Winston in London. Mr. Raggett has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Winston.

93. In September 2020, Jonathan Robb joined Paul Hastings as an associate in the London office. From September 2012 to July 2013, Mr. Robb was an intern at Deloitte LLP in Madrid. Mr. Robb has informed Paul Hastings that he did not work on matters related to the Debtors or the Title III Cases and was not exposed to confidential information related to the Debtors or the Title III Cases while he was at Deloitte.

94. As discussed in the Fifth Supplemental Declaration, Diana Gong worked as a 2019 summer associate in Paul Hastings' Palo Alto office. From February 2014 to May 2014, Ms. Gong was a legal researcher in the Beijing office of Jones Day. Ms. Gong has informed Paul Hastings that she did not work on matters related to the ERS bondholders or the Debtors and was not exposed to confidential information related to the ERS bondholders or the Debtors while she was at Jones Day. In October 2020, Ms. Gong joined Paul Hastings as an associate in the Palo Alto office.

95. As discussed in the Fifth Supplemental Declaration, Junxiao Aldrich Huang worked as a 2019 summer associate in Paul Hastings' New York office. From March 2013 to May 2013, Mr. Huang was an intern in the Beijing office of Morrison & Foerster. Mr. Huang has informed Paul Hastings that he did not work on matters related to the ad hoc group of bondholders or the Debtors and was not exposed to confidential information related to such entities or the Debtors while he was at Morrison & Foerster. In October 2020, Mr. Huang joined Paul Hastings as an associate in the New York office.

iii. Other New Hires

96. In May 2020, Bandar Al-Saif joined Paul Hastings as an associate in the New York office. From September 2018 to May 2020, and in the summer of 2017, Mr. Al-Saif was an associate and summer associate, respectively, at Norton Rose. Mr. Al-Saif has informed Paul Hastings that, while at Norton Rose, he worked on certain matters unrelated to the Title III Cases for FTI Consulting Canada Inc. and Telxius Cable USA Inc. Mr. Al-Saif further informed Paul Hastings that, while at Norton Rose, he represented AES Corp. in matters related to PREPA for two months in 2018, but was not exposed to confidential information related to PREPA, the PBA, or the Debtors. Out of an abundance of caution, Paul Hastings has imposed (and will continue to impose) an ethical wall between Mr. Al-Saif and the firm's representation of the Committee in the PREPA matter in the Title III Cases.

* * *

97. Based on the foregoing and the Prior Declarations, and except as provided herein and in the Prior Declarations, to the best of my knowledge, information, and belief formed after reasonable inquiry, Paul Hastings does not represent or hold any interest adverse to the Committee with respect to the matters on which the Committee has employed Paul Hastings, and Paul Hastings is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code (made applicable by PROMESA section 301(a)) in that Paul Hastings:

- (a) is not a creditor, equity security holder, or insider of the Debtors;
- (b) is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the Debtors; and
- (c) does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

98. Despite the efforts described above to identify and disclose Paul Hastings' connections with parties in interest in the Title III Cases, Paul Hastings is unable to state with certainty that every client representation or other connection has been disclosed. In this regard, if Paul Hastings discovers additional information that requires disclosure, Paul Hastings will file a supplemental disclosure with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of October 2020

/s/ Luc A. Despins

Luc A. Despins